

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHEILA PORTER,
Plaintiff

v.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.
Defendants

Civil Action No. 04-11935-DPW

**DEFENDANTS' MOTION FOR LEAVE TO FILE THE ATTACHMENTS TO
THEIR MOTION FOR SUMMARY JUDGMENT ONE DAY LATE**

Now come the Defendants, Andrea Cabral, Suffolk County Sheriff's Department, and Suffolk County who move this Honorable Court for leave to file the attachments to their Motion for Summary Judgment one day late.

As Reasons therefore, Counsel states that the Department is experiencing problems with the scanner. At this point, there is only one scanner available at the facility and each page must be scanned as a separate document and then combined. The scanner is extremely slow.

Defendants did not anticipate this problem when scheduling time to complete the instant motion. Further, a one-day delay for exhibits will not prejudice any other party.

Respectfully submitted
Andrea Cabral, Suffolk County Sheriff's
Department and Suffolk County
By their attorney

/s/ Ellen M. Caulo
Ellen M. Caulo
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114
(617) 961-6681

Date: October 17, 2005

LOCAL RULE 7.1 CERTIFICATION

I, hereby certify that I have attempted to confer with counsel for the Plaintiff in an effort to resolve the issues raised in this motion.

/s/ Ellen M. Caulo
Ellen M. Caulo